

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER
AUTHORITY,

Debtor.

PROMESA Title III

Case No. 17 BK 4780-LTS

(This court filing relates only to
Case No. 17 BK 4780-LTS)

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION, ASSURED GUARANTY CORP., ASSURED GUARANTY MUNICIPAL CORP., and SYNCORA GUARANTEE INC.,

Movants,

v.

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*, and PUERTO RICO ELECTRIC POWER AUTHORITY,

Respondents.

NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION,

Movants on the Motion to Compel,

v.

CITIGROUP GLOBAL MARKETS INC.,

Respondents on the Motion to Compel.

STIPULATED WITHDRAWAL OF NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION'S URGENT MOTION TO COMPEL PRODUCTION OF DOCUMENTS, A CATEGORICAL PRIVILEGE LOG, AND OTHER RELIEF FROM CITIGROUP GLOBAL MARKETS INC.

TO THE HONORABLE COURT:

On January 11, 2019, National Public Finance Guarantee Corporation ("National") served a Subpoena for the Production of Documents to Citigroup Global Markets Inc. ("Citigroup"), seeking documents relevant to the Motion by National, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Syncora Guarantee Inc. (together, "Movants") for relief

from the Automatic Stay to Allow Movants to Enforce Their Statutory Right to Have a Receiver Appointed. ECF No. 975.

On March 28, 2019, National filed an *Urgent Motion to Compel Production of Documents, a Categorical Privilege Log, and Other Relief from Citigroup Global Markets Inc.* ECF No. 1154 (the “Motion to Compel”).

On April 2, 2019, National and the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”) filed a *Joint Urgent Motion Seeking Entry of a Scheduling Order*. ECF No. 1160 (the “Scheduling Motion”). The Scheduling Motion requested that the Court enter a scheduling order consistent with the briefing and hearing dates agreed to by National and the Oversight Board.

This Court entered an *Order Setting Briefing Schedule* (ECF No. 1161, the “Scheduling Order”) on April 2, 2019, resolving the Scheduling Motion and setting the following briefing and hearing dates: (1) oppositions to the Motion to Compel shall be filed by April 8, 2019; (2) a reply in support of the Motion to Compel shall be filed by April 12, 2019; and (3) the Court will hold a hearing on the Motion to Compel on April 16, 2019 in Boston, Massachusetts.

National, the Oversight Board, and Citigroup (together, the “Parties”) have since engaged in a further meet and confer process. The Parties, while reserving all rights, claims, and defenses with respect to the issues raised in the Motion to Compel, have arrived at a mutually agreeable resolution of the issues raised in the Motion to Compel (which terms are documented in an email dated April 5, 2019).

NOW, THEREFORE, IT IS HEREBY STIPULATED AS FOLLOWS:

1. National hereby voluntarily withdraws, without prejudice, its Motion to Compel. National reserves all rights with respect to the issues raised in its Motion to Compel.

2. The briefing and hearing dates set by this Court's Scheduling Order are hereby vacated.

IT IS SO STIPULATED.

DATED: April 5, 2019

Respectfully Submitted,

**ADSUAR MUNIZ GOYCO SEDA & PEREZ-
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